

REMARKS

Reconsideration and allowance of the above referenced application are respectfully requested.

After reviewing the detailed comments in the advisory action, the undersigned understands the point that Basri discussed items that a person might conclude might be used for a model. While the undersigned continues to believe that Basri does not teach or suggest or disclose the subject matter of the previous claims, nonetheless, these claims are amended herewith to define further distinctions.

Specifically, as described in the specification, an important feature of this system is its ability to operate unsupervised based on different images, without any previous knowledge of the images. The way that the present disclosure does this is to divide the feature candidates between foreground and background, see the Perona et al. publication, paragraph 33. This specifically is done by classifying the image with the feature, reclassifying the images without the feature, see paragraphs 37 and 69 of the publication. The determination of whether the feature should be included is based on this determination.

None of this is in any way disclosed, taught or suggested by any of the cited prior art. Basri, for example, talks about a non-Euclidean similarity measure, but teaches nothing about

this disclosure which determines the probability of whether a feature should be included in the class based on analyzing the features with the probability and without the probability.

The "recognition" document talks about prior knowledge and conditional searches, but does not disclose this feature either.

While the secondary references teach other elements, such as joint probability detection, they do not teach or suggest the joint probability detection features of current claims.

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants ask that all claims be allowed. Please apply the \$395 RCE fee and any credits or additional charges to deposit account 06-1050.

Respectfully submitted,

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